



OFFICE OF THE RAMSEY COUNTY ATTORNEY
JOHN J. CHOI, COUNTY ATTORNEY

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MAY 05 2023

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

November 25, 2019

Fontell Fuller
1010 Currie Avenue
Minneapolis, MN 55403

Via Hand Delivery and Email

RE: Plaintiff's Request for Clarification of Defendants' Discovery Responses
***Fontell Fuller v. Stanley Hafoka et al.* [Case No. 19-cv-00886]**
Our File No. 76736

Dear Mr. Fuller:

I am writing in response to our telephone conversation of November 20, 2019. You requested clarification of the Defendants' responses to your discovery requests. Specifically, you asked me to affirmatively state that the Defendants do not have video of the use of force incident, involving you and correctional officers, that occurred on April 14, 2017.

As we have discussed previously, the Defendants do not have video of the use of force incident. Any video images of the incident would have been captured on the Adult Detention Center's wall-mounted camera system ("Avigilon System"). That system captures video 24 hours a day, seven days a week, throughout the jail. Because of the large volume of video captured on the Avigilon System, storage is limited, and video is eventually overwritten to make room for new video. Your lawsuit was not filed until March 29, 2019—nearly two years after the incident and well after the data would have been overwritten.

The sheriff's office does have video of you, recorded immediately after the incident, which was captured by Sgt. Routhe's body camera. This was produced to you. The sheriff's office also has video of you captured approximately one day before the incident, which was captured by Sgt. Kim Abel's body camera. This video will be produced to you upon receipt of your discovery request. In 2017, only sergeants wore body cameras, which were activated—at their discretion—when responding to incidents. Those cameras are separate from the Avigilon System, and that video is not automatically overwritten, which is why that video remains.

Respectfully,

Kimberly Parker
Assistant Ramsey County Attorney
(651) 266-3117



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RAMSEY COUNTY

From: Everson, Tanya M
To: fullerf@augsborg.edu
Cc: Parker, Kimberly R; Jamison, Andrea F
Subject: Fuller v. Hafoka, et al 19-cv-886
Date: Monday, November 25, 2019 3:10:00 PM
Attachments: Letter to Fuller re request for clarification 11-25-19.pdf

Please see the attached sent on behalf of Kimberly Parker. This letter will be hand delivered to you today upon your arrival.



Tanya Everson
Senior Legal Secretary – Civil Division
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